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January 15, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: **CC Docket 94-102**
Enhanced 911 Tier III Interim Report
Alaska DigiTel, L.L.C.

Dear Ms. Dortch:

On behalf of the above-referenced carrier there is transmitted herewith a narrative statement regarding the company's E-911 deployment and implementation status. The filer is a Tier III carrier submitting its Interim Report in accordance with the provisions of the Commission's *Order to Stay*, CC Docket 94-102, FCC 03-241 (rel. October 10, 2003), as well as the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order To Stay (rel. July 26, 2002) and the subsequent FCC Public Notice released June 30, 2003, DA 03-2113.

If questions arise with regard to this filing, please contact the undersigned.

Very truly yours,



Todd Slamowitz

Alaska DigiTel, LLC

January 15, 2004

Interim Report of the Status of Enhanced 911 Phase II Compliance

Item 1: Number of Phase I and Phase II Requests from PSAPs

Alaska DigiTel, LLC ("Alaska DigiTel") received a PSAP request from the Anchorage PSAP dated May 15, 2003. The Anchorage PSAP's request notified them that it expected to have Phase I and II capabilities by the end of 2003. However, Alaska DigiTel was subsequently informed by the Anchorage PSAP that they will not have these E911 capabilities within the proposed timeframe. Alaska DigiTel has not received any subsequent request from the Anchorage PSAP.

Item II: Carrier Specific Technology Choice

At this time, Alaska DigiTel plans on deploying a handset-based solution for its CDMA network. With respect to its GSM network, it has not selected a solution since it has no GSM subscribers at this time.

Item III: Status on ordering and/or installing network equipment.

At this time, the PSAP's in Alaska DigiTel's service area are not yet capable of receiving Phase I or Phase II service. Nonetheless, Alaska DigiTel's CDMA network is Phase I capable. However, based upon price quotes already received from a vendor, the connectivity costs associated with delivering Phase I service to the PSAPs will be substantial. In order to become Phase II capable utilizing a handset-based technology, Alaska DigiTel must make several upgrades to its CDMA network, including both software and hardware upgrades. It currently is negotiating with several vendors regarding the necessary upgrades. Alaska DigiTel expects the costs of the upgrades to be substantial, and as a small carrier, it has limited funding options. Thus, it expects the financial requirements to become both Phase I and Phase II compliant to place a severe strain on its proposed E911 roll-out plans. As for its GSM network, Alaska DigiTel is Phase I capable. Its vendor is in the process of determining if its GSM network can be upgraded to provide Phase II service. If so, Alaska DigiTel expects the costs to be in line with the costs associated with Phase I implementation on its GSM network.

Item IV: ALI-Capable Handset Availability

ALI-capable handsets for CDMA networks are currently available. Alaska DigiTel is in the process of determining which handsets will be best suited for their subscribers. Nonetheless, it is premature for Alaska DigiTel to enter into any agreements with handset vendors as it must first complete the necessary upgrades to its CDMA network.

Item V: Estimated date on which Phase II service will first be Available

Alaska DigiTel anticipates being able to provide Phase I and Phase II E911 service to its subscribers by June 30, 2005.

Item VI: Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

By December 31, 2005, Alaska DigiTel anticipates that 100 percent of all new handsets sold will be ALI-capable. However, ultimate implementation will require Alaska DigiTel to convert a majority of its current subscribers to ALI-capable handsets in order to meet the 95 percent penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's rules. Based on the number of CDMA subscribers, the costs associated with implementing Phase I and Phase II service, and the onerous task of converting its current CDMA subscribers to location-capable handsets,, Alaska DigiTel believes it won't be able to meet this requirement.

CERTIFICATE OF SERVICE

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 15th day of January, 2004, sent by hand-delivery, a copy of the foregoing Enhanced 911 Tier III Interim Report of Alaska DigiTel, L.L.C. to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

David Solomon, Chief*
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-C485
Washington, D.C. 20554

D'wana Terry, Chief*
Public Safety and Critical Infrastructure Division
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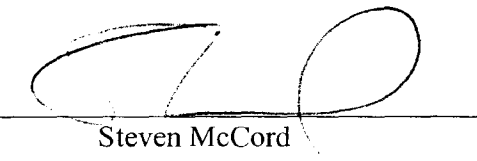
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Montpelier, VT 05620-6501



Steven McCord

*via hand-delivery

A F F I D A V I T

County of Shelby

State of tennessee

SS:

I, Stephen M. Roberts, having been first duly sworn, depose and state as follows:

1. I am Managing Director and Corporate Secretary for Alaska DigiTel, LLC.
2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Stephen M. Roberts
Managing Director, Secretary
Alaska DigiTel, LLC

Subscribed to and sworn to before me
this 14th day of January, 2004.

Lynda L. Smith
Notary Public

My commission expires:

MY COMMISSION EXPIRES JULY 28, 2004

